Q.1 - What will happen to the SOG Collection System (Equip ID 9820? Will this be shutdown too?

The SOG Collection System (ID 9820) will be retired in place along with the condensate steam stripper (ID 9801) following the conversion to unbleached pulp. As provided for under Standard No. 7(b)(34)(viii), these sources will be permanently retired in place after the Kraft pulp mill begins manufacturing unbleached pulp for production of linerboard on the No. 3 paper machine, which is defined in (b)(34)(viii) as following a reasonable shakedown period of 180 days.

Q.2 - Is the SOG Collection System really a control device? Doesn't it just collect the materials. Does it treat or remove any pollutants?

The SOG Collection System is identified in the Title V permit as equipment and as a control device. This addendum does not propose modifying the designations in the Title V permit.

Q.3 - Why is "modify" checked for the SOG Collection System? If the steam stripper is being removed, what off gases is there to collect? Perhaps just change the name?

The SOG Collection System was thought to collect both the condensate steam stripper (ID 9801) and the foul condensate collection tank (ID 9800), and the portion of the system collecting ID 9800 would remain operational. An engineering review has determined the foul condensate collection tank is vented into the LVHC collection system (ID 5260C) and will continue to be collected by the LVHC collection system to meet 40 CFR Part 63 Subpart S requirements. Form 2567 has been corrected for the SOG Collection System.

Q.4 - Are the emission rates prior to construction the same as prior to c/p-DF? If so, some of the rates are not the same as the starting point present in the application for c/p-DF. Why? The uncontrolled rates for PM2.5, SO2, VOC, and MeOH are different. I have a typo in my SOB for cp-DF on MeOH. What about the others listed here? Have changes taken place at the facility that caused the rates to change?

No changes at the facility have occurred to cause the emissions rates prior to construction to change. The application form was borrowed from the original June 2019 c/p-DF construction permit application. Form 2569 has been corrected to list the same emissions rates prior to construction as in the c/p-DF application update in July 2019. The post-construction emissions rates have also been corrected.

Q.5- There are differences in the controlled rates too - PM, SO2, VOC. Are the SO2 rates supposed to be the same for uncontrolled and controlled for the prior to rates?

Form 2569 has been corrected to list the same emissions rates prior to construction as in the c/p-DF application update in July 2019. The post-construction emissions rates have also been corrected.

Bureau of Air Quality
Construction Permit Application
Equipment / Processes

APPLICATION IDENTIFICATION *(Please ensure that the information list in this table is the same on all of the forms and required information submitted in this construction permit application package.)*		
Facility Name *(This should be the name used to identify the facility)*	SC Air Permit Number (8-digits only) *(Leave blank if one has never been assigned)*	Application Date
New-Indy Catawba LLC	2440 - 0005	April 13, 2020

PROJECT DESCRIPTION
Brief Project Description (What, why, how, etc.): Modify Kraft pulp mill to manufacture unbleached pulp. Treat foul condensate using hard pipe and wastewater treatment system (aerated biotreatment) and retire condensate steam stripper.

ATTACHMENTS	
☒ Process Flow Diagram	Location in Application: Figure 1
☒ Detailed Project Description	Location in Application: Section 2

EQUIPMENT / PROCESS INFORMATION

Equipment ID Process ID	Action	Equipment / Process Description	Maximum Design Capacity (Units)	Control Device ID(s)	Pollutants Controlled (Include CAS#)	Capture System Efficiency and Description	Emission Point ID(s)
9801	☐ Add ☒ Remove ☐ Modify ☐ Other	Condensate Steam Stripper [Retired in Place]	(b)(4) [redacted]	9820, 2605, 3705	VOC, HAPs, TRS	Stripper Off Gases (SOGs) Collection System	2610S1, 2610S2
9802	☒ Add ☐ Remove ☐ Modify ☐ Other	Hard Pipe	(b) (4) [redacted]	2901	VOC, HAPs, TRS	Hard Pipe	None
2901	☐ Add ☐ Remove ☒ Modify ☐ Other	Aerated Biotreatment (Aerated Stabilization Basin)	NA	None	VOC, HAPs, TRS	Aerated Biotreatment	Fugitive

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Bureau of Air Quality
Construction Permit Application
Equipment / Processes

CONTROL DEVICE INFORMATION					
Control Device ID	Action	Control Device Description	Maximum Design Capacity (Units)	Inherent/Required/Voluntary (Explain)	Destruction/Removal Efficiency Determination
9820	☐ Add ☒ Remove ☐ Modify ☐ Other	Stripper Off Gases (SOGs) Collection System [Retired in Place]	N/A	Required to comply with 40 CFR Part 60, Subpart BB/BBa and 40 CFR Part 63, Subpart S	99.9%
9802	☒ Add ☐ Remove ☐ Modify ☐ Other	Hard Pipe	(b) (4)	Required to comply with 40 CFR Part 63, Subpart S	>95%
2901	☐ Add ☐ Remove ☒ Modify ☐ Other	Aerated Biotreatment	N/A	Required to comply with 40 CFR Part 63, Subpart S	>95%

RAW MATERIAL AND PRODUCT INFORMATION			
Equipment ID Process ID Control Device ID	Raw Material(s)	Product(s)	Fuels Combusted
9802	Foul Condensate	None	none
2901	Foul Condensate, Mill Wastewater	Treated Wastewater	none

MONITORING AND REPORTING INFORMATION					
Equipment ID Process ID Control Device ID	Pollutant(s)/Parameter(s) Monitored	Monitoring Frequency	Reporting Frequency	Monitoring/Reporting Basis	Averaging Period(s)
2901	Condensate Treatment	Daily	Semi-annual	40 CFR Subpart 63 Subpart S	15-days

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Bureau of Air Quality
Construction Permit Application
Emissions

APPLICATION IDENTIFICATION *(Please ensure that the information list in this table is the same on all of the forms and required information submitted in this construction permit application package.)*		
Facility Name *(This should be the name used to identify the facility)*	SC Air Permit Number (8-digits only) *(Leave blank if one has never been assigned)*	Application Date
New-Indy Catawba LLC	2440 - 0005	April 13, 2020

ATTACHMENTS *(Check all the appropriate checkboxes if included as an attachment)*	
☒ Sample Calculations, Emission Factors Used, etc.	☒ Detailed Explanation of Assumptions, Bottlenecks, etc.
☒ Supporting Information: Manufacturer's Data, etc.	☐ Source Test Information
☒ Details on Limits Being Taken for PTE Emissions	☒ NSR Analysis

SUMMARY OF PROJECTED CHANGE IN FACILITY WIDE POTENTIAL EMISSIONS
(Calculated at maximum design capacity.)

Pollutants	Emission Rates Prior to Construction / Modification (tons/year)			Emission Rates After Construction / Modification (tons/year)		
	Uncontrolled	Controlled	PTE	Uncontrolled	Controlled	PTE
Particulate Matter (PM)	111,415	1,986	NA	111,296	1,867	NA
Particulate Matter <10 Microns (PM_{10})	77,797	1,252	NA	77,639	1,094	NA
Particulate Matter <2.5 Microns ($PM_{2.5}$)	65,449	993	NA	65,319	862	NA
Sulfur Dioxide (SO_2)	24,145	22,682	NA	19,103	18,112	NA
Nitrogen Oxides (NO_x)	3,630	3,630	NA	2,860	2,860	NA
Carbon Monoxide (CO)	3,601	3,601	NA	3,141	3,141	NA
Volatile Organic Compounds (VOC)	8,414	1,903	NA	2,193	1,690	NA
Lead (Pb)	14.3	14.3	NA	14.3	14.3	NA
Highest HAP Prior to Construction (CAS #: 67561)	6,955	917	NA	1,360	972	NA
Highest HAP After Construction (CAS #: 67561)	6,955	917	NA	1,360	972	NA
Total HAP Emissions*	7,331	1,129	NA	1,609	1,153	NA

Include emissions from exempt equipment and emission increases from process changes that were exempt from construction permits.
(*All HAP emitted from the various equipment or processes must be listed in the appropriate "Potential Emission Rates at Maximum Design Capacity" Table)

Bureau of Air Quality

Construction Permit Application

Emissions

Bureau of Air Quality

Construction Permit Application

Emissions

POTENTIAL EMISSION RATES AT MAXIMUM DESIGN CAPACITY									
Equipment ID / Process ID	Emission Point ID	Pollutants (Include CAS #)	Calculation Methods / Limits Taken / Other Comments	Uncontrolled		Controlled		PTE	
				lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr
9802, 2901	Fugitive	TRS	See Attachment B	29.5	129	NA	NA	NA	NA
9802, 2901	Fugitive	H2S	See Attachment B	2.27	10.0	NA	NA	NA	NA
9802, 2901	fugitive	VOC	See Attachment B	135	593	NA	NA	NA	NA
9802, 2901	fugitive	Methanol	See Attachment B	135	593	NA	NA	NA	NA